

EXHIBIT 1

CROWLEY | FLECK PLLP
ATTORNEYS

Invoice Date: July 31, 2015

RE John Talmage Bad Faith Claim
dba Montana Diamond Aire, Inc. and RJT Properties,
LLC
Claim No.: JY13J0149787

Ace Property & Casualty Insurance Company

One Beaver Valley Road
Wilmington, DE 19803

Amount Remitted \$ _____

PLEASE REMIT TO: P.O. Box 30441 Billings, MT 59107

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PROFESSIONAL SERVICES

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07/15 Y15SF004288M

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<u>Date</u>	<u>Atty</u>	<u>Description</u>	<u>Phase</u>	<u>Task</u>	<u>Hours</u>	<u>Amount</u>
07/16/15	DCC	Attend telephone conference with opposing counsel regarding upcoming depositions, discovery deadlines, and discovery responses and discuss conference with Mr. Habein.	L330	A107	0.50	100.00

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07/16/15	PFH	Review correspondence with Ms. Moore to prepare for conference call, review prediscovery disclosures, and attend attorneys' conference call to work out additional discovery issues.	L210	A104	1.10	308.00
07/16/15	PFH	E-mails with Ms. Moore regarding discovery dispute.	L330	A107	0.20	56.00
07/17/15	DCC	Outline motion to compel production of the subpoenaed documents reserved as privileged.	L350	A103	0.40	80.00
07/17/15	DCC	Research waiver of privilege portion of the motion to compel the subpoenaed documents reserved as privileged.	L350	A102	1.70	340.00
07/17/15	DCC	Research common interest doctrine portion of the motion to compel the subpoenaed documents reserved as privileged.	L350	A102	1.90	380.00
07/17/15	DCC	Research at issue doctrine portion of the motion to compel the subpoenaed documents reserved as privileged.	L350	A102	1.40	280.00
07/17/15	PFH	E-mails with Ms. Moore regarding follow-up on discovery, stipulation on dates and extending discovery.	L310	A106	0.30	84.00
07/20/15	DCC	Draft fact and legal standard sections of the motion to compel compliance with the subpoenas.	L350	A103	0.90	180.00
07/20/15	DCC	Draft compliance with the court's current order section of the motion to compel compliance with the subpoenas.	L350	A103	0.50	100.00
07/20/15	DCC	Draft the privilege waiver section of the motion to compel compliance with the subpoenas.	L350	A103	2.40	480.00

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07/20/15	DCC	Draft the common interest doctrine section of the motion to compel compliance with the subpoenas.	L350	A103	1.10	220.00
07/20/15	DCC	Draft the "at issue" doctrine section of the motion to compel compliance with the subpoenas.	L350	A103	0.90	180.00
07/21/15	DCC	Draft contempt and sanction section and the introduction section of the motion to compel compliance with the subpoenas.	L350	A103	2.00	400.00
07/21/15	DCC	Revise motion to compel compliance with the subpoenas.	L350	A103	0.60	120.00
07/21/15	DCC	Draft the actual motion of the motion to compel compliance with the subpoena and the court's order.	L350	A103	0.20	40.00
07/22/15	DCC	Draft the actual motion of the motion to compel compliance with the subpoena and the court's order.	L350	A103	0.50	100.00

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07/28/15	DCC	Revise motion to compel subpoena production based on the inadequate subpoena response.	L350	A103	2.90	580.00
07/28/15	DCC	Draft motion to compel discovery responses.	L350	A103	2.50	500.00
07/28/15	DCC	Research privilege waiver for failing to provide a privilege log in order to draft the motion to compel production of subpoena responses.	L350	A102	0.60	120.00
07/28/15	DCC	Research the failure to assert privilege in discovery responses in order to draft motion to compel discovery responses.	L350	A102	0.40	80.00
07/29/15	DCC	Review plaintiffs amended Rule 26 disclosures	L340	A104	0.30	60.00
07/29/15	DCC	Revise motion to compel subpoena production based on the inadequate subpoena response.	L350	A103	1.00	200.00
07/29/15	DCC	Revise motion to compel discovery based on the inadequate discovery responses.	L350	A103	0.50	100.00

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07/29/15	DCC	Research the failure to assert privilege in discovery responses pursuant to the federal rules of procedure in order to draft motion to compel discovery responses.	L350	A102	1.30	260.00
07/29/15	DCC	Review and analyze plaintiffs amended discovery responses.	L320	A104	0.40	80.00
07/29/15	PFH	Review suggested changes to brief from [REDACTED] and follow up on suggestions.	L350	A104	0.40	112.00
07/30/15	DCC	Revise motion to compel subpoena production based on the inadequate subpoena response.	L350	A103	1.50	300.00
07/30/15	DCC	Draft and revise waiver privilege section of the motion to compel discovery based on the inadequate discovery responses.	L350	A103	1.60	320.00
07/30/15	DCC	Draft and revise undue burden and broadness section of the motion to compel discovery based on the inadequate discovery responses.	L350	A103	1.60	320.00

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07/30/15	PFH	Review, revise draft motion to compel.	L250	A103	0.40	112.00
07/31/15	DCC	Draft and revise implied waiver section on the motion to compel discovery based on the inadequate discovery responses.	L350	A103	2.00	400.00
07/31/15	DCC	Draft and revise "at issue" section on the motion to compel discovery based on the inadequate discovery responses.	L350	A103	0.50	100.00
07/31/15	DCC	Research and analyze the implied waiver in order to draft the implied privilege waiver section of the motion to compel discovery based on the inadequate discovery responses.	L350	A102	1.30	260.00
07/31/15	DCC	Final review and edits of the motion to compel discovery based on the inadequate discovery responses and its associated brief and exhibits.	L350	A103	0.60	120.00
07/31/15	DCC	Research the failure to assert privilege in discovery responses in order to draft motion to compel discovery responses.	L350	A102	0.80	160.00
07/31/15	PFH	Review draft motion to compel, exhibits, brief.	L250	A104	0.40	112.00

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